



**A Message from the
South Carolina Pharmacy Association and
Carolina Pharmacy Network
Boards of Directors**

On House Bill 3394

February 17, 2009

The South Carolina Pharmacy Association (SCPhA) and the Carolina Pharmacy Network (CPN) Boards of Directors voted unanimously to oppose House Bill 3394. The proposed legislation would require all pharmacy technicians entering the workforce after July 2012 to be 17 years of age, have a high school diploma or equivalent, complete 1,000 hours of work under the supervision of a pharmacist, pass a national exam (i.e. PTCB, ExCPT) and complete a formal academic training program accredited by the American Society of Health-System Pharmacists or similar nationally accredited organization approved by the Board of Pharmacy. Registered technicians in the workforce prior to July 2012 would be allowed to continue as registered technicians.

Our Boards share the public's interest in patient safety and in minimizing preventable errors. A medication error is a complex and multifaceted issue which can often be attributed to numerous causes. Pharmacies should maintain and participate in continuous quality improvement initiatives whereby they review systems and processes within their pharmacy to help reduce medication errors.

By law, all work by pharmacy technicians must be checked and verified by a pharmacist. Unlike other para-professionals in South Carolina, such as cosmetologists, estheticians, and nail technicians, neither pharmacy technicians nor state certified pharmacy technicians have the authority to exercise independent professional judgment or the ability to practice with autonomy.

South Carolina law presently allows two levels of technicians which is serving the public and the profession well. All pharmacy technicians working in a pharmacy today must register with the State Board of Pharmacy and are required to perform their duties under the direct supervision of a pharmacist. Existing law already allows a pharmacy technician to further become State Certified to perform additional duties, at all times under the direct supervision of a pharmacist. Current State Certification requires pharmacy technicians to meet standards identical to those proposed in the legislation (SC Code of Laws 40-43-82). Furthermore, a pharmacist may supervise no more than three pharmacy technicians at a given time provided that two of the three technicians are

State Certified. Otherwise a pharmacist may supervise no more than two pharmacy technicians (SC Code of Laws 40-43-86 B (4)(b)).

In their unanimous decision, the SCPPhA and CPN Boards cited numerous reasons for their decision. Although the effort is commendable, the unintended consequences of such a proposal have not been fully determined. The proposal may lead to a situation whereby pharmacies across the State, particularly those in rural areas, would find it difficult to properly and adequately staff their pharmacies with the necessary supportive personnel. The undue burden placed on the profession of pharmacy, particularly to independent pharmacies, may lead to staffing shortages in the area of pharmacy technicians. The SCPPhA & CPN Boards are not fully convinced that the supply of pharmacy technicians will be adequate come 2012 if this proposal were to go into effect. The time and costs associated with completing an academic training program will undoubtedly result in fewer technicians entering the workforce. The resulting shortage may further place pressure on a pharmacy staff that is already stretched.

Additionally, the implications of what impact this would have on future pharmacists are not clear. Many successful and dedicated pharmacists began their careers as part-time technicians in their local community pharmacy. The proposed legislation would completely eliminate the opportunity that was afforded so many pharmacists in the workforce today.

Moreover, the Board of Pharmacy has not taken a position on the proposed legislation. It was requested by the Board of Pharmacy that all interested parties meet, prior to the filing of legislation, to discuss the proposed language. The Board of Pharmacy suggested the SC Society of Health-System Pharmacists meet with the chain pharmacy association to discuss the proposal and report to the Board of Pharmacy's Technician Committee. Without the support of all pharmacy stakeholders, the profession will most likely and unfortunately repeat the events of the last legislative session in which the profession of pharmacy was severely divided.